

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VMWARE LLC,

Plaintiff,

v.

SIEMENS AG, SIEMENS CORPORATION,
SIEMENS INDUSTRY SOFTWARE, INC.,
SIEMENS MEDICAL SOLUTIONS USA,
INC., SIEMENS HEALTHCARE
DIAGNOSTICS, INC., SIEMENS
MOBILITY, INC., and PETNET
SOLUTIONS, INC.,

Defendants.

CIVIL ACTION No. 25-353 (RGA)

**DECLARATION OF PAUL SALAZAR
IN SUPPORT OF DEFENDANTS' MOTIONS TO DISMISS UNDER RULE 12(b)**

1. I, Paul Salazar, make this declaration pursuant to 28 U.S.C. § 1746 in support of Defendants' Motion to Dismiss Under Rule 12(b).

2. I am Principal Counsel for Siemens AG. I have been in-house counsel for Siemens AG in various capacities since 2000.

3. The facts set forth in this declaration are known to me personally.

4. Siemens AG is a German stock corporation organized and existing under the laws of Germany. Its principal place of business is Munich, Germany.

5. Siemens AG is amenable to process in Germany.

6. Siemens AG has direct and indirect ownership interests in a number of subsidiaries and affiliates that engage in business activities around the world, including the United States. Those ownership interests range from 100% ownership interests to some smaller interests.

7. Siemens AG's subsidiaries and affiliates, including the named defendants in this action, are legal entities separate and distinct from Siemens AG. Siemens AG exercises influence over those direct and indirect subsidiaries and affiliates, if at all, only in its capacity as a direct or indirect shareholder and in accordance with the applicable local laws; the respective articles of incorporation and bylaws; and the rights of any other shareholders.

8. Siemens AG has separate officers and directors from each of its subsidiaries and affiliates named as defendants in this case.

9. Siemens AG has separate day-to-day management from its subsidiaries and affiliates.

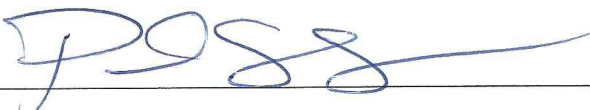
10. Siemens AG has no place of business, telephone listing or mailing address in the State of Delaware.

11. Siemens AG does not employ anyone in the United States or in the State of Delaware.

12. Siemens AG is not registered to do business in the State of Delaware.
13. Siemens AG does not pay taxes in the State of Delaware.
14. Siemens AG does not have any offices or facilities in the United States or in the State of Delaware.
15. Siemens AG does not own any real property in the State of Delaware.
16. Siemens AG does not have any bank accounts in the State of Delaware.
17. VMware's Complaint identifies manufacturing sites in Newark/Glasgow and New Castle, Delaware. Complaint ¶¶17. Neither of these facilities are owned or operated by Siemens AG.
18. VMware's Complaint identifies Ms. Astrid Mueller as "a primary point person for Siemens AG." Complaint ¶¶22, 97. Ms. Mueller is not an employee of Siemens AG. Ms. Mueller is employed by Siemens Corporation. Her work location is in the State of Georgia. Ms. Mueller does not work or reside in the State of Delaware.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: June 10, 2025



Paul Salazar

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on June 10, 2025, upon the following in the manner indicated:

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/s/ Karen Jacobs

Karen Jacobs (#2881)